

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**CORRECTED DECLARATION OF  
MILES EHRLICH IN SUPPORT OF  
PLAINTIFF WAYMO'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS OPPOSITION TO  
DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO, LLC'S MOTION TO  
EXCLUDE ONE OF THREE OPINIONS  
PROFFERED BY WAYMO EXPERT  
JIM TIMMINS (Dkt. 1773)**

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal Its Opposition To Defendants Uber Technologies, Inc. And Ottomotto, LLC’s Motion To Exclude One Of Three Opinions Proffered By Waymo Expert Jim Timmins (Dkt.

1773) (“The Administrative Motion”). The Administrative Motion seeks an order sealing the following documents based on Mr. Levandowski’s designation of privilege and/or confidentiality:

Document	Portion to Be Filed Under Seal	Designating Party
Waymo’s Opposition To Defendants Uber Technologies, Inc. And Ottomotto, LLC’s Motion To Exclude One Of Three Opinions Proffered By Waymo Expert Jim Timmins (“Waymo’s Brief”)	Highlighted Portions	Anthony Levandowski (yellow highlights)
Exhibit 4 to Waymo’s Brief	Entire Document	Anthony Levandowski
Exhibit 9 to Waymo’s Brief	Highlighted Portions	Anthony Levandowski (yellow highlighted portions)

3. The yellow-highlighted portions of Waymo’s Brief reflect confidential information regarding Mr. Levandowski’s estate planning for his family, including his minor children, through the creation of a trust of which they are the beneficiaries, as well as other personal financial information. Mr. Levandowski requests that his confidentiality and privacy interests in this personal estate and financial information be respected in this proceeding.

4. Exhibit 4 is the document through which Mr. Levandowski created a trust for the benefit of his minor children. Because this document reflects sensitive, personal, estate planning, and financial information, Mr. Levandowski requests that the confidentiality and privacy of this document be maintained.

5. Exhibit 9 is an excerpt of the deposition of Mr. Levandowski, the yellow highlighted portions of which reflect the same confidential estate planning and personal financial information discussed in paragraphs 3 and 4 above. Mr. Levandowski therefore requests that this information remain confidential.

6. Waymo’s request to seal is narrowly tailored to those portions of Waymo’s

1 Opposition To Defendants Uber Technologies, Inc. And Ottomotto, LLC's Motion To Exclude  
2 One Of Three Opinions Proffered By Waymo Expert Jim Timmins that merit sealing.  
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4 I declare under penalty of perjury under the laws of the State of California and the United  
5 States of America that the foregoing is true and correct, and that this declaration was executed in  
6 Berkeley, California, on September 26, 2017.  
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8 Date: September 26, 2017

Respectfully submitted,

9  
10 /s/ Miles Ehrlich

Miles Ehrlich

Ramsey & Ehrlich LLP

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12 *Counsel for Non-Party Anthony*  
13 *Levandowski*  
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